

REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed August 13, 2004. Reconsideration and allowance of the application and pending claims are respectfully requested.

I. Allowable Subject Matter

Applicant appreciates the Examiner's indication that claims 5 and 19 would be allowable if rewritten to include all of the limitations of the base claim and any intervening claims.

In that it is believed that every rejection has been overcome, it is respectfully submitted that each of the claims that remains in the case is presently in condition for allowance.

II. Claim Objection

Claim 16 has been objected for containing a typographical error. In response to the objection, Applicant has amended claim 16 to correct the typographical error.

In view of the above-noted claim amendment, Applicant respectfully submits that claim 16 is not objectionable and respectfully requests that the objection be withdrawn.

III. Claim Rejections - 35 U.S.C. § 102(e)

Claims 1-4, 6-18, 20-36 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Endoh (U.S. Pat. No. 6,707,566). Applicant respectfully traverses this rejection.

It is axiomatic that “[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration.” W. L. Gore & Associates, Inc. v. Garlock, Inc., 721 F.2d 1540, 1554, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983)(emphasis added). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e). In the present case, not every feature of the claimed invention is represented in the Endoh reference. Indeed, as the following discussion elucidates, the Endoh reference fails to reach most of the limitations of Applicant’s claims.

A. The Endoh Disclosure

As is described by Endoh, it is desirable in certain situations to print a given print job on a plurality of printing apparatuses in parallel to improve print speed. Endoh, column 1, lines 22-28. One problem with such parallel printing, however, is network traffic. Endoh, column 1, lines 37-40. As a solution to that problem, Endoh proposes a “multicasting protocol” by which a transmitting source (e.g., PC) can transmit data to a plurality of transmission destinations (e.g., printers) by one transmission. Endoh, column 1, lines 45-48. With such a protocol, the printing apparatuses receive print data and print instructions and, therefore, can process the print data in accordance with the print instructions. Endoh, column 2, lines 1-12.

Although Endoh discloses the above-described multicasting protocol, Endoh is silent as to collecting and manipulating data from printers.

B. Applicant's Claims

Applicant's claims describe methods, systems, and devices with which data can be collected from one or more of a plurality of printers. For example, independent claim 1 provides (emphasis added):

1. A method, comprising:
creating a plurality of printer groups;
for each of a plurality of printers, *associating the printer with one or more of the printer groups by assigning a printer identifier with at least one of the one or more printer groups*, the printer identifier uniquely identifying the printer;
collecting data from one or more of the plurality of printers;
aggregating the collected data by printer group for one or more of the printer groups; and
processing the aggregated data.

As is described in the foregoing, Endoh is silent to collecting and manipulating data from printers. For this reason, it follows that Endoh does not teach or suggest "collecting data from one or more of the plurality of printers", "aggregating the collected data by printer group", or "processing the aggregated data". Endoh therefore fails to anticipate claim 1 for at least this reason.

The Office Action alleges that Endoh anticipates the above-noted limitations in column 4, lines 54-64, which provides in full:

The printer driver 402 activates a user interface 403. The user interface 403 displays a dialog window for promoting the user to input a group address and printing conditions of the printer onto the display 207.

When the user inputs the group address and printing conditions of the printer by the user interface 403, the user interface 403 sends the

inputted group address and printing condition of the printer to the printer driver 402. A print instruction common to all of the printers and a print instruction to each printer are included in the printing conditions. The print instruction will be described later.

As is clear from the above excerpt, Endoh is only describing a process for transmitting a print job *to* the printers of the group along with the “printing conditions” that are “input” by the user and which comprise the instructions to the printers as to how to complete the job. This interpretation is supported by the fact that Endoh is describing the actions of a “printer driver.” Contrary to that implied in the Office Action, this excerpt has nothing to do with collecting data *from* a printer.

In addition to the aforementioned deficiencies of the Endoh reference, Endoh fails to teach or suggest creating a plurality of printer groups and “associating the printer with one or more of the printer groups by assigning a printer identifier with at least one of the one or more printer groups” as is also provided in claim 1. Although Endoh anticipates sending a print job to multiple printers, which could be argued to comprise a “group,” Endoh simply fails to anticipate “associating” a printer to a particular group by “assigning a printer identifier” to the group.

In view of the foregoing, it is clear that the Endoh reference is woefully inadequate in terms of anticipating independent claim 1. Applicant therefore respectfully requests that the rejection of claim 1, and claims 2-4 and 6-11 which depend therefrom, be withdrawn.

Applicant notes that the Endoh disclosure is similarly deficient in terms of anticipating Applicant’s other independent claims. For instance, in relation to independent claim 12, Endoh fails to disclose any of: “associating the printer with one or more of the printer groups by assigning a printer identifier with at least one of the

one or more printer groups”, “collecting data from one or more of the plurality of printers”, “aggregating the collected data by printer group for one or more of the printer groups”, or “processing the aggregated data” for reasons described above. Moreover, Endoh fails to teach or suggest “presenting the one or more printer groups and the printers associated with the one or more printer groups in a user interface”.

Referring to independent claim 17, Endoh does not teach or suggest a printer that includes a “data collection module configured to collect printer usage data from the printer” or a “connection to a host computer, the host computer configured to associate the printer identifier with one or more printer groups identified by the host computer”. Again, Endoh’s disclosure pertains to multicasting a print job to a plurality of printers, not collecting data from them.

With regard to independent claim 24, Endoh also does not teach or suggest a system including a “printer group information module configured to associate each printer with a printer group, collect printer usage data from the printers of one or more printer groups, and aggregate the printer usage data” for reasons described above.

Regarding independent claim 27, Endoh fails to teach or suggest a computing device that is programmed to present a user interface that allows a user to “associate a printer with one or more of the printer groups by assigning a printer identifier with at least one of the one or more printer groups, the printer identifier uniquely identifying the printer”, “collect data from one or more of the plurality of printers”, or “aggregate the collected data by printer group for one or more of the printer groups” for reasons described above.

Finally, regarding independent claim 32, Endoh fails to teach or suggest a processor that is configured to process computer-executable instructions to perform the following functions: “associating a printer identifier from each of a plurality of

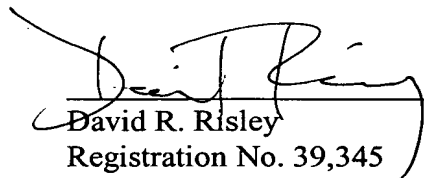
printers with one or more of multiple printer groups”, “collecting printer usage data from the printers associated with one or more of the printer groups”, and “aggregating the collected data according to printer group” for reasons described above.

Due to the many shortcomings of the Endoh reference described in the foregoing, Applicant respectfully asserts that Endoh does not anticipate Applicant’s claims. Therefore, Applicant respectfully requests that the rejection of these claims be withdrawn.

CONCLUSION

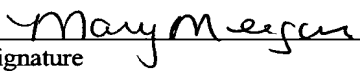
Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,


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9-30-04


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